

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DARRYL GARNER,	:	CIVIL ACTION
	:	
Plaintiff,	:	
	:	
v.	:	
	:	NO.
JJAMM AUTO TRANSPORT LLC,	:	
	:	JURY TRIAL DEMANDED
Defendant.	:	
	:	
	:	
	:	

To: **United States District Court**
Eastern District of Pennsylvania

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. § § 1441 and 1446, Defendant named as JJAM Auto Transport, LLC, (hereinafter “Defendant”) by and through its attorneys, Goldberg Segalla LLP, submits this Notice of Removal from the Pennsylvania Court of Common Pleas, Philadelphia County, in which the above-captioned matter is now pending, to the United States District Court for the Eastern District of Pennsylvania. In support of said Notice, Defendant states as follows:

1. This is a personal injury action arising from an alleged motor vehicle accident that occurred on August 17, 2016 on or about East Tioga Street, in the City of Philadelphia, Commonwealth of Pennsylvania. *A true and correct copy of Plaintiff's Complaint is attached hereto as Exhibit “A”.*

2. Plaintiff alleges that Defendant owned a car hauler, and a car detached from it and struck Plaintiff. *See Exhibit “A”.*

3. Plaintiff commenced this action on August 01, 2018 by filing a civil Complaint in the Pennsylvania Court of Common Pleas, Philadelphia County bearing Docket No. 180703685, and captioned above.

4. Defendant was served with a copy of the Summons and Complaint via certified mail on September 25,, 2018. *See* Exhibit "B".

5. Pursuant to 28 U.S.C. § 1446(a) copies of all process, pleadings and orders in this matter are attached hereto.

Timeliness of Removal

6. 28 U.S.C. § 1446(b)(3) reads in relevant part "...if the case stated by the initial pleading is not removable, a notice of removal may be filed within thirty days after receipt by the defendant, through service or otherwise, of a copy of an amended pleading, motion, or other paper from which it may first be ascertained that the case is one which is or has become removable."

7. Further, 28 U.S.C. § 1446(c)(3)(A) provides "If the case stated by the initial pleading is not removable solely because the amount in controversy does not exceed the amount specified in section 1332(a), information relating to the amount in controversy in the record of the State proceeding, or in responses to discovery, shall be treated as "other paper" under subsection (b)(3).

8. Since this Notice of Removal is being filed within thirty (30) days of Defendant's first notice that the case is removable, it is timely filed pursuant to 27 U.S.C. § 1446(b)(3).

Amount in Controversy

9. Since receipt of the Complaint, Defendant has contacted Plaintiff's counsel in order to ascertain if the amount in controversy exceeds \$75,000.00, and suggested that if it does not, that Plaintiff agree to sign a stipulation confirming same. *See* Exhibit "C".

10. This was filed as a major jury matter, which indicates that the amount in controversy certainly exceeds \$50,000.00 *See* Exhibit “A”.

11. Plaintiff alleges that he sustained disc herniations and/or protrusions at C4-C5, C5-C6, C6-C7, C7-T1, L5-S1, and L4-5, as a result of the subject accident. *See* Exhibit “A”.

12. Plaintiff also alleges that he has incurred various expenses for his medical treatment, and will require future medical treatment. He also claims lost wages and future lost earning capacity as a result of the accident. *See* Exhibit “A”.

13. On or about October 22, 2018, Plaintiff’s counsel advised that he is unable to sign a stipulation capping any potential recovery at \$75,000.00. *See* Exhibit “D”.

14. Thus, it is clear that the amount in controversy exceeds \$75,000.00.

Diversity of Citizenship

15. The Complaint indicates that plaintiff, Darryl Garner, is domiciled at 2651 N. Darien Street, Philadelphia, Pennsylvania. *See* Exhibit “A”.

16. Defendant P.C. Richard is a New Jersey limited liability company. The only members of the limited liability company are John Schlitter and Maureen Schlitter who are domiciled in the state of Florida, and reside at 7 Northwest Place, Cape Coral, Florida.

17. Diversity of citizenship existed among the proper parties, Plaintiff and Defendant when the Complaint was filed. Diversity of citizenship still exists among the proper parties at the time this Notice of Removal is being filed.

Plea for Removal

18. This Honorable United States District Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332 because this is a civil action in which there

is complete diversity of citizenship between Plaintiff and Defendant, and in which the amount in controversy exceeds \$75,000, exclusive of interest and costs, as described below.

19. Therefore, this civil action is removable to this Court pursuant to 28 U.S.C. §1441.

20. Pursuant to 28 U.S.C. § 1446(d), a copy of this Notice of Removal is being submitted for filing with the Clerk of the Pennsylvania Court of Common Pleas, Philadelphia County, and is being served upon Plaintiff.

21. In filing this Notice of Removal, Defendant does not waive any defects in service of process, venue or personal jurisdiction.

23. For the foregoing reasons, this United States District Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332(a).

WHEREFORE, Defendant files this Notice of Removal so that the entire State Court Action under Docket No. 180703685, now pending in the Pennsylvania Court of Common Pleas, Philadelphia County, shall be removed to this Court for all further proceedings.

This 23rd day of October 2018

GOLDBERG SEGALLA LLP

By: 

John A. DeRose
Attorneys for defendants JJAMM Auto
Transport LLC

Dated: October 23, 2018

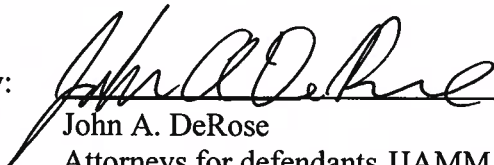
IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DARRYL GARNER,	:	CIVIL ACTION
	:	
Plaintiff,	:	
	:	
v.	:	
	:	NO.
JJAMM AUTO TRANSPORT LLC,	:	
	:	JURY TRIAL DEMANDED
Defendant.	:	
	:	
	:	
	:	

AFFIDAVIT

John A. DeRose, Esquire, being sworn according to law deposes and says that she is counsel for Petitioners, JJAMM Auto Transport LLC, in the within matter; and that he has read the foregoing Notice for Removal and believes it to be true and correct, to the best of his knowledge, information and belief.

GOLDBERG SEGALLA LLP

By:  _____
John A. DeRose
Attorneys for defendants JJAMM Auto
Transport LLC

Dated: October 23, 2018

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DARRYL GARNER,	:	CIVIL ACTION
	:	
Plaintiff,	:	
	:	
v.	:	
	:	NO.
JJAMM AUTO TRANSPORT LLC,	:	
	:	JURY TRIAL DEMANDED
Defendant.	:	
	:	
	:	
	:	

CERTIFICATE OF SERVICE

I, John A. DeRose Esquire, hereby certify that a copy of the attached has been served on the following individuals by the following means on this 23rd day of October 2018:

VIA ELECTRONIC FILING

Prothonotary
Philadelphia County
City Hall
Philadelphia, PA 19107

VIA FIRST CLASS MAIL

Jason E. Fine, Esquire
1628 John F. Kennedy Blvd,
Suite 2120
Philadelphia, PA 19103
Attorney for Plaintiff

EXHIBIT "A"

J. FINE LAW GROUP, P.C.

By: Jason E. Fine, Esquire
 Attorney ID#: 82452
 Michelle Mall, Esquire
 Attorney ID#: 318100
 1628 John F. Kennedy Blvd., Suite 2120
 Philadelphia, PA 19103
 Phone: (267) 888-2960
 Fax: (267) 687-7018
 Email: Jason@jfinelaw.com
Michelle@jfinelaw.com

Attorneys for Plaintiff,
 Darryl Garner



DARRYL GARNER	:	COURT OF COMMON PLEAS
2651 N. Darien Street	:	PHILADELPHIA COUNTY
Philadelphia, PA 19133	:	
Plaintiff,	:	JULY TERM, 2018
v.	:	NO.:
	:	
JJAMM AUTO TRANSPORT LLC	:	MAJOR NON JURY CASE
34 Rhode Island Road	:	ASSESSMENT OF DAMAGES
Sicklerville, NJ 08081	:	HEARING IS REQUIRED
Defendant.	:	

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

**PHILADELPHIA BAR ASSOCIATION
 LAWYER REFERRAL AND INFORMATION
 SERVICE**

One Reading Center
 Philadelphia Pennsylvania 19107
 Telephone: (215) 238-1701

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentar una comparecencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

**ASOCIACIÓN DE LICENCIADOS DE FILADELFIA
 SERVICIO DE REFERENCIA E INFORMACIÓN
 LEGAL**

One Reading Center
 Filadelfia, Pennsylvania 191107

J. FINE LAW GROUP, P.C.

By: Jason E. Fine, Esquire
Attorney ID#: 82452
Michelle Mall, Esquire
Attorney ID#: 318100
1628 John F. Kennedy Blvd., Suite 2120
Philadelphia, PA 19103
Phone: (267) 888-2960
Fax: (267) 687-7018
Email: Jason@jfinelaw.com
Michelle@jfinelaw.com

Attorneys for Plaintiff,
Darryl Garner

DARRYL GARNER	:	COURT OF COMMON PLEAS
2651 N. Darien Street	:	PHILADELPHIA COUNTY
Philadelphia, PA 19133	:	
Plaintiff,	:	JULY TERM, 2018
v.	:	NO.:
	:	
JJAMM AUTO TRANSPORT LLC	:	MAJOR NON JURY CASE
34 Rhode Island Road	:	ASSESSMENT OF DAMAGES
Sicklerville, NJ 08081	:	HEARING IS REQUIRED
Defendant.	:	

CIVIL ACTION COMPLAINT
2V – MOTOR VEHICLE ACCIDENT

COMES NOW, Plaintiff, Darryl Garner, by and through his counsel, J. Fine Law Group, P.C., hereby file this Complaint against Defendant, and in support thereof avers as follows:

Parties

1. Plaintiff, **Darryl Garner**, is an adult individual and citizen of the Commonwealth of Pennsylvania residing at the above captioned address. (hereafter referred to as “**Plaintiff**”).
2. Defendant, **Jjamm Auto Transport LLC**, is a business, company, carrier, entity, partnership, franchise, fictitious name, proprietorship or corporation existing and/or qualifying under the laws of New Jersey and/or Pennsylvania, with a registered office for the acceptance of service or a principal place of business at the above-captioned address (hereafter referred to as “**Defendant**”).

Jurisdiction and Venue

3. Plaintiff, Darryl Garner, hereby incorporates by reference paragraphs one through two (1-2), inclusive as though same were set forth herein at length.

4. The accident giving rise to the instant matter occurred in the Commonwealth of Pennsylvania and more specifically in the City and County of Philadelphia.

5. Jurisdiction is appropriate in the Commonwealth of Pennsylvania pursuant to 42 Pa.C.S. § 5322.

6. Venue is appropriate in Philadelphia County pursuant to 246 Pa. Code Rule 302(A) and Pa.R. Civ.P. 2179 and/or Pa.R. Civ.P. 1006.

Common Averments

7. Plaintiff, Darryl Garner, hereby incorporates by reference paragraphs one through six (1-6), inclusive as though same were set forth herein at length.

8. On or about August 17, 2016, Plaintiff, Darryl Garner, was lawfully on the street in front of 2942 E. Tioga Street, in the City and County of Philadelphia, Commonwealth of Pennsylvania, when suddenly and without warning, a motor vehicle that had detached from a car hauler that was owned and operated by Defendant and its employees and/or agents, rolled into and struck Plaintiff, causing Plaintiff to suffer serious and permanent injuries as more fully described *infra*.

9. At all times material and relevant to this Complaint, Defendant, owned, leased, controlled and/or had dominion over the car hauler and/or the motor vehicle that rolled into and struck Plaintiff.

10. The aforesaid motor vehicle collision was a direct result of the negligence and/or carelessness of Defendant and was due in no manner whatsoever to any act or failure to act on the part of Plaintiff, Darryl Garner.

COUNT ONE – NEGLIGENCE
DARRYL GARNER v. JJAMM AUTO TRANSPORT LLC

11. Plaintiff, Darryl Garner, hereby incorporates by reference paragraphs one through ten (1-10), inclusive as though same were set forth herein at length.

12. The negligence and/or carelessness of Defendant, by and through its employees and/or agents, was the direct and proximate cause of the impact described herein, with said negligence being more fully described as:

- (a) failing to properly operate its respective motor vehicle;
- (b) failing to maintain a proper and adequate lookout;
- (c) failing to properly secure motor vehicle(s) on its car hauler;
- (d) operating the car hauler and/or motor vehicle in a negligent and careless manner;
- (e) operating the car hauler and/or motor vehicle without due regard to the rights, safety, and position of Plaintiff, Darryl Garner;
- (f) failing to have the car hauler and/or motor vehicle under proper control so as to prevent the motor vehicle from striking Plaintiff;
- (g) failing to use due care under the circumstances;
- (h) failing to warn invitees, independent contractors, licensees, guests, and/or the general public of the dangerous, hazardous, and unsafe conditions;
- (i) failure to take reasonable precautions against the dangerous, hazardous, and unsafe conditions;
- (j) violating the relevant ordinances and the Statutes of the Commonwealth of Pennsylvania governing the operation of motor vehicles;
- (k) failing to inspect for unsafe and/or hazardous conditions; and
- (l) inattentiveness while operating a motor vehicle.

13. As a direct cause of the impact and negligence described, Plaintiff, Darryl Garner, suffered serious and permanent losses of body functions including, but not limited to disc herniation at C5-6; disc protrusions at C4-5, C6-7, C7-T1, L5-S1, and L4-5; and annular tears at C2-3, and C3-4, and various other injuries and ills.

14. As a further result of this accident, Plaintiff, Darryl Garner, has been obligated to receive and undergo reasonable and necessary medical treatment and rehabilitative services for the injuries suffered and to incur various expenses for said treatment and services for which Defendant is responsible for.

15. As a further result of this accident, Plaintiff, Darryl Garner, has been obligated to receive and undergo reasonable and necessary medical treatment and rehabilitative services for the injuries he has suffered, and to incur various expenses for said treatment and services, and he may incur various reasonable and necessary future medical expenses from the injuries sustained, and Defendant, is liable for all the same.

16. As a further result of this accident, Plaintiff, Darryl Garner, has or may suffer severe actual loss of his gross income.

17. As a further result of this accident, Plaintiff, Darryl Garner, has or may suffer impairment of his earning capacity and power.

18. As a further result of the aforementioned accident, Plaintiff, Darryl Garner, has suffered physical pain, aches, mental anguish, and humiliation, inconveniences and loss of life's pleasures, and he may continue to suffer same for an indefinite time in the future.

19. As a direct result of this accident, Plaintiff, Darryl Garner, has been unable to attend to his daily chores, duties and occupations and may be unable to do so for an indefinite period of time in the future.

WHEREFORE, Plaintiff, Darryl Garner, demands damages of Defendant, Jjam Auto Transport LLC, in a sum in excess of Fifty Thousand Dollars (\$50,000.00) plus interest, costs and any other relief which this Court may deem appropriate.

COUNT TWO – RESPONDENT SUPERIOR
DARRYL GARNER v. JJAMM AUTO TRANSPORT LLC

20. Plaintiff, Darryl Garner, hereby incorporates by reference paragraphs one through nineteen (1-19) as if fully set forth herein at length.

21. At all times relevant hereto, the driver operating Defendant's car hauler, was the employee, servant, family member, friend, or otherwise an agent of Defendant, Jjamm Auto Transport LLC, and moreover, at all times relevant hereto, the driver operating Defendant's car hauler, was acting within the scope of said employment or agency.

WHEREFORE, Plaintiff, Darryl Garner, demands damages of the Defendant, in a sum in excess of Fifty Thousand Dollars (\$50,000.00) plus interest, costs and any other relief which this Court may deem appropriate.

COUNT THREE– NEGLIGENT ENTRUSTMENT
DARRYL GARNER v. JJAMM AUTO TRANSPORT LLC

22. Plaintiff, Darryl Garner, hereby incorporates by reference paragraphs one through twenty-one (1-21) as if fully set forth herein at length.

23. The negligence and carelessness of Defendant consisted of, inter alia, the following:

(a) negligently entrusting their vehicle to an individual who was not equipped to operate their vehicle safely and/or with due care for others;

(b) negligently entrusting their vehicle to an individual who exhibited a disregard for the safety and well-being of others; and

(c) failing to properly train and/or instruct the individual operating Defendant's vehicle, in the safe operation and usage of his/her motor vehicle.

24. As a direct and proximate cause of the aforesaid negligence of Defendant, Plaintiff Darryl Garner suffered damages as fully described infra in this complaint

WHEREFORE, Plaintiff, Darryl Garner demands damages of the Defendant, in a sum in excess of \$50,000.00 plus interest, costs and any other relief which this Court may deem appropriate.

Respectfully submitted,
J. FINE LAW GROUP, P.C.

BY: /s/
JASON E. FINE, ESQUIRE
MICHELLE MALL, ESQUIRE
Attorneys for Plaintiff

VERIFICATION

I, JASON E. FINE, ESQUIRE, hereby verify that I am counsel for Plaintiff, Darryl Garner, and herein state that the statements in the foregoing Civil Action Complaint are true and correct to the best of my knowledge, information and belief. I am making this Verification on behalf of Plaintiff. I acknowledge that the foregoing Verification is made subject to the penalties of 18 Pa.C.S.A. §4904 relating to unsworn falsification to authorities.

/s/
JASON E. FINE, ESQUIRE

EXHIBIT "B"

SENDER: COMPLETE THIS SECTION

- Complete Items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Jamm Auto Transport LLC
c/o John Schlitter
7 NW 13th Place
Cape Coral FL 33993



9590 9402 3359 7227 3236 48

2. (Transfer from service label)

7017 2680 0000 0711 7865

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over \$500)

☐ Priority Mail Express®☐ Registered Mail™☐ Registered Mail Restricted Delivery☒ Return Receipt for Merchandise☐ Signature Confirmation™☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete Items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Jamm Auto Transport LLC
c/o FV Clemente
326 Delsea Drive N
Glassboro NJ 08028



9590 9402 3359 7227 3236 31

Article Number (Transfer from service label)

7017 2680 0000 0711 791

S Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

9/25/18

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☒ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over \$500)

☐ Priority Mail Express®☐ Registered Mail™☐ Registered Mail Restricted Delivery☒ Return Receipt for Merchandise☐ Signature Confirmation™☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

EXHIBIT "C"

DeRose, John A.

From: DeRose, John A. <jderose@goldbergsegalla.com>
Sent: Sunday, October 14, 2018 10:25 AM
To: 'jason@jfinelaw.com'; 'Michelle@jfinelaw.com'
Subject: Darryl Garner v. JJAMM Auto Transport, LLC / Service and Removal to Federal Court [GSLAW-IMANAGE.FID2358787]

Jason and Michelle,

I recently entered my appearance on behalf of the defendant in the above-referenced matter. My records indicate that we have not yet been served with the Complaint. Please let me know if my understanding is incorrect. As there is complete diversity here, it is our intention to remove this matter to federal court if the amount in controversy is in excess of \$75,000.00. If I do not hear back from you by Tuesday, we will assume that you are seeking an amount greater than \$75,000.00 and prepare to remove this matter to federal court.

I look forward to working with you.

John

John A. DeRose, Esq.

jderose@goldbergsegalla.com

Please send mail to: PO Box 360, Buffalo, NY 14201

1700 Market Street, Suite 1418 | Philadelphia, PA 19103-3907

DIRECT 267.519.6838 | Ext. 6838 | FAX 267.519.6801 | MOBILE 856.419.2227

vCard | www.goldbergsegalla.com



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North Carolina | Pennsylvania | New Jersey | Connecticut | United Kingdom



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EXHIBIT "D"

DeRose, John A.

From: DeRose, John A. <jderose@goldbergsegalla.com>
Sent: Monday, October 22, 2018 3:01 PM
To: Jason Fine
Cc: 'Michelle Mall'
Subject: RE: Darryl Garner v. JJAMM Auto Transport, LLC / Service and Removal to Federal Court [GSLAW-IMANAGE.FID2358787]

Jason,

Thanks for taking the time to speak with me today. As per our discussion, you are unable to sign a stipulation capping your client's potential recovery at \$75,000.00. We will proceed with removing this matter to federal court.

Thanks,

John

John A. DeRose, Esq.

jderose@goldbergsegalla.com

1700 Market Street, Suite 1418 | Philadelphia, PA 19103-3907

DIRECT 267.519.6838 | Ext. 6838 | FAX 267.519.6801 | MOBILE 856.419.2227

Please send mail to: PO Box 360, Buffalo, NY 14201

vCard | www.goldbergsegalla.com



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North Carolina | Pennsylvania | New Jersey | Connecticut | United Kingdom



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2018



BEST PLACES
to work in PA 2017

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From: Michelle Mall <michelle@jfinelaw.com>

Sent: Monday, October 15, 2018 12:44 PM

To: DeRose, John A. <jderose@goldbergsegalla.com>

Cc: Angelina Charles <angie@jfinelaw.com>; Jason Fine <jason@jfinelaw.com>

Subject: RE: Darryl Garner v. JJAMM Auto Transport, LLC / Service and Removal to Federal Court [GSLAW-IMANAGE.FID2358787]